

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

_____)	
RICHARD E. KAPLAN,)	
)	
<i>Plaintiff,</i>)	
)	
v.)	Civil Action No. 04-10402-NMG
)	
FIRST HARTFORD CORPORATION,)	
)	
<i>Defendant.</i>)	
_____)	

**FIRST HARTFORD CORPORATION’S MOTION FOR
LEAVE TO FILE A REPLY MEMORANDUM IN FURTHER SUPPORT
OF ITS MOTION FOR RECONSIDERATION OR FOR CLARIFICATION**

Defendant First Hartford Corporation (“FHC”) respectfully moves this Court for leave to file a short reply memorandum to plaintiff Richard E. Kaplan (“Kaplan”)’s Opposition to FHC’s Motion for Reconsideration or for Clarification. A copy of the proposed reply is attached to this motion as Exhibit “1.”

FHC seeks leave to file this short reply brief to respond to a number of factually inaccurate assertions made by Kaplan in his opposition. FHC believes the granting of this motion for leave to file a reply will materially assist the Court in rendering its decision on FHC’s Motion for Reconsideration or for Clarification.

WHEREFORE, FHC requests that the Court grant its Motion for Leave to File a Reply Memorandum in Further Support of its Motion for Reconsideration or for Clarification.

Respectfully submitted,

FIRST HARTFORD CORPORATION

By its attorneys,

/s/ Jonathan I. Handler
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-and-

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Dated: December 23, 2004

LOC. R. 7.1(A)(2) CERTIFICATION

I, Jonathan I. Handler, hereby certify that on December 22, 2004, I conferred by telephone with Larry C. Kenna, counsel for plaintiff Richard E. Kaplan, in a good faith attempt to resolve or narrow the issues raised by this motion. During that conversation, Mr. Kenna stated that his client takes no position on First Hartford Corporation's filing of the instant motion.

/s/ Jonathan I. Handler
Jonathan I. Handler

CERTIFICATE OF SERVICE

I, Jonathan I. Handler, hereby certify that on this 23rd day of December, I served a true and correct copy of the foregoing *First Hartford Corporation's Motion for Leave to File a Reply Memorandum In Further Support of its Motion for Reconsideration or for Clarification* via first class mail on Larry C. Kenna, Choate, Hall & Stewart, Exchange Place, 53 State Street, Boston, Massachusetts, 02109.

/s/ Jonathan I. Handler
Jonathan I. Handler